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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ, <i>et al.</i> ,)	CASE NO. 3:15-cv-03808-EMC
Plaintiff,)	
v.)	STIPULATION OF DISMISSAL AND
)	[PROPOSED] ORDER THEREON
APENA CORP., <i>et al.</i> ,)	
Defendants.)	

The Parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2).

IT IS HEREBY STIPULATED by and between parties to this action through their designated counsel that the above-captioned action become and hereby is dismissed with prejudice and each side is to bear its own costs and attorneys' fees.

The parties further consent to and request that the Court retain jurisdiction over enforcement of the Agreement. *See Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement agreements).

Respectfully Submitted,

Dated: January 30, 2017

THOMAS E. FRANKOVICH, APLC
A PROFESSIONAL LAW CORPORATION

By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
Attorneys for Plaintiff

Dated: January 30, 2017

MARVIN PEDERSON, ATTORNEY AT LAW

By: /s/ Marvin Pederson
Marvin Pederson
Attorney for Defendant Apena Corp.

Dated: January 30, 2017

VAN DE PEOL, LEVY, ALLEN & ARNEAL, LLP

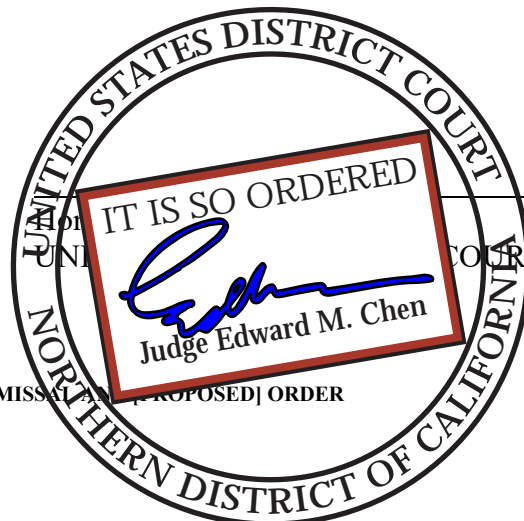
By: /s/ Nicolet E. Corliss
Nicolet E. Corliss
Attorneys for Defendants Demetrios Giannis and
Rose Giannis

ORDER

IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing the parties' Settlement Agreement and General Release should such enforcement be necessary.

Dated: 2 / 2, 2017



COURT JUDGE

STIPULATION OF DISMISSAL AND PROPOSED ORDER